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ASSOCIATION OF AMERICAN RAILROADS

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December 12, 2011

Honorable Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E St., S.W.
Washington, DC 20423

Re: Ex Parte No. 706, Reporting Requirements for Positive Train Control Expenses and Investments

Dear Ms. Brown:

Pursuant to the Board's Notice of Proposed Rulemaking served October 13, 2011, please find the Comments of the Association of American Railroads for filing in the above proceeding.

Respectfully submitted,

Louis P. Warchot

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Counsel for the Association of American Railroads

Attachment

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BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Docket No. EP 706

REPORTING REQUIREMENTS FOR POSITIVE TRAIN CONTROL EXPENSES AND INVESTMENTS

COMMENTS OF THE
ASSOCIATION OF AMERICAN RAILROADS

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Introduction

A. The Board's October 13, 2011 Notice of Proposed Rulemaking ("NPRM")

In an NPRM served October 13, 2011, the Surface Transportation Board ("Board") proposed to amend its rules to require rail carriers that submit Railroad Annual Report Form R-1 reports ("R-1 reports") that identify information on capital and operating expenditures for Positive Train Control ("PTC")[1] "to break out those expenses so that they can be viewed both as component parts of and separately from other capital investments and expenses." NPRM at 1.[2] The Board requires Class I rail carriers to submit the annual R-1 reports, which contain information about finances and operating statistics for each railroad. 49 C.F.R. § 1241.11.

[1] PTC describes technologies designed to automatically stop or slow a train before certain accidents caused by human error would occur. In particular, PTC is designed to prevent train-to-train collisions, derailments caused by excessive speed, unauthorized incursions by trains onto sections of track where maintenance activities are taking place, and the movement of a train through a track switch left in the wrong position. PTC requires sophisticated computer software, reliable communications systems, and other complex technologies to monitor current train conditions, detect upcoming track conditions, and take control of the train when needed.

[2] The instant rulemaking is a follow-up to the Board's February 10, 2011 decision granting an October 13, 2010 petition filed by the Union Pacific Railroad Company (UP) requesting the Board to institute a rulemaking proceeding to adopt supplemental schedules that would require Class I carriers to separately identify PTC expenditures in annual R-1 reports to the Board.

Currently, PTC expenditures are primarily incorporated into the R-1 report under the categories of "capital expenditures" (i.e., investments) and "operating expenses;" PTC expenditures, however, are not separately broken out. The proposed rule would require that expenditures and certain statistical information for PTC installation, maintenance, and operation be separately identified and submitted in a supplement to the R-1. *Id* at 3.

The NPRM noted that: (1) rail carriers with traffic routes that carry passengers and/or hazardous toxic-by-inhalation or poisonous-by-inhalation materials (collectively "TIH"), as so designated by law, must implement PTC by 2015 pursuant to federal legislation;[3] (2) PTC expenses and investments, especially in the installation stage, are projected to be "high";[4] (3) Class I rail carriers have indicated that they are already incurring PTC-related costs to meet the 2015 deadline;[5] and (4) PTC costs represent a "relatively specific set of expenditures prompted directly by legislative mandate."[6]

The Board further noted that a PTC schedule separate from the R-1 filings currently required would provide the Board with "important" information. *Id.* at 3. It would help the Board to "... identify transportation industry changes that may require attention by the agency and to assist the Board in preparing financial and statistical summaries and abstracts to provide itself, Congress, other government agencies, the transportation industry, and the public with transportation data useful in making regulatory policy and business decisions." *Id.* at 3-4.

The Board noted that its proposed rule change would require a "PTC Supplement" to be filed along with the R-1 annual report that would include proposed PTC versions of

[3] The Rail Safety Improvement Act of 2008, Pub. L. No. 110-432, § 104 (a), 122 Stat. 4848, 4856-57 (2008), requires Class I rail carriers to implement PTC by December 31, 2015, on mainlines where intercity rail transportation or commuter rail passenger transportation is regularly scheduled, and/or on mainlines over which TIH, as designated in 49 C.F.R. pts. 171.8, 173.115 and 173.132, are transported. 49 U.S.C. § 20157 (i) (3).
[4] NPRM at 3-4.
[5] *Id.* at 4.
[6] *Id.*

supplemental R-1 reporting schedules 330, 332, 335, 352B, 410, 700, 710, and 720. All of the proposed schedules were set forth in Appendix B of the NPRM except for Schedule 352B which was presumably inadvertently omitted. Accordingly, Appendix B should be modified to include the "PTC Supplement" for Schedule 352B to be consistent with its proposal in the NPRM.

The Board requested comments on its proposal.[7]

B. Summary of the AAR's Position Supporting the Board's Proposal

The AAR, on behalf of its member freight railroads, strongly supports the Board's proposal and offers several additional recommendations. As the Board recognizes, PTC expenditures will constitute a significant cost to the rail industry, and rail carriers are currently incurring significant PTC-related expenditures to meet the 2015 deadline. *Id.* at 4. Unless the Board establishes the proposed PTC reporting requirements early in the PTC implementation process, it may be unable to account accurately for PTC costs in pursuing its general industry oversight responsibilities as well as potential specific regulatory initiatives, such as improving the Uniform Rail Costing System ("URCS") to better reflect the costs associated with transporting TIH. (See EP 681, *Class I Railroad & Financial Reporting—Transportation of Hazardous Materials* (Advance Notice of Proposed Rulemaking ("ANPR") served January 5, 2009).)

[7] As described by the Board, "[t]he supplement would provide for PTC versions of schedules 330 (road property and equipment improvements), 332 (depreciation base and rates—road property and equipment), 335 (accumulated depreciation), 352B (investment in railway property), and 410 (railway operating expenses) containing the dollar amounts that would reflect only the amounts attributable to PTC for the filing year. Also, the PTC Supplement would contain PTC versions of schedules 700 and 720, to report the aggregate mileage on which PTC is installed as of the date of filing, and schedule 710 to identify the number of locomotives equipped with PTC. Railroads would also report, by footnote in each supplement schedule, PTC-related expenditures for passenger-only service not otherwise captured in the individual schedules to allow the Board to understand fully the railroads' PTC expenditures." *Id* at 5.

The AAR urges that the Board act expeditiously to adopt the proposed rules and to set specific target dates for the implementation of the Board's proposed schedules. In particular, the AAR recommends that the Board provide for the following in any final rules:

(1) The Board should set a mandatory target date of the 2012 Calendar Year (as captured in the 2012 R-1 filed by the carriers on March 31, 2013) for the reporting of all proposed schedules other than Schedule 410 (i.e., supplemental R-1 reporting schedules 330, 332, 335, 352B, 700, 710, and 720). These schedules would capture current and ongoing PTC-related capital expenditures and depreciation and also identify associated track and equipment.

(2) The Board should phase-in the reporting of operating expenses. The urgency for reporting PTC expenses is not as immediate because significant PTC-related operating expenses reported in Schedule 410, unlike currently ongoing rail carrier investments in PTC-related systems and components, will not be incurred by the railroad industry until PTC systems are in place on specific line segments, and because capturing and allocating PTC operating expenses is more complex than reporting PTC-related capital investments. The AAR proposes a mandatory target date of the 2014 Calendar Year (as captured in the 2014 R-1 filed by the carriers on March 31, 2015) for the reporting of Schedule 410.

(3) The Board should permit carriers to submit any of the proposed schedules for PTC costs incurred in any calendar year prior to these mandatory target dates on a voluntary basis as soon as the Schedules are adopted by the Board.

(4) The Board should provide a grace period of 90 days after the submission of the R-1 for the filing of the PTC-related schedules. Carriers would, however, be free to file the PTC-related schedules earlier on a voluntary basis if they are prepared to do so (e.g., at the time the R-1 is filed).

(5) The Board should provide for a review of these reporting requirements one year after the implementation date for PTC.

(6) Because capital expenditures for the implementation of PTC are reported on the R-1 by carriers as *net* expenditures (i.e., gross expenditure net of sums received from government transfers), the Board's proposal relating to the reporting of government grant funds for PTC implementation on a supplementary R-1 PTC Grants schedule is unnecessary and potentially confusing. If the Board needs the project specific information requested in the proposed PTC Grants schedule, the Board should provide that it be submitted in a separate report subject to appropriate confidentiality conditions to protect any sensitive commercial or security information it may contain.[8]

(7) The Board should require carriers to report operating statistics pertaining to TIH movements under Schedule 755 by the mandatory target date of the 2012 Calendar Year . This operating data would assist the Board in monitoring the effects of PTC implementation.

Discussion

A. PTC Implementation Costs Are Significant to the Rail Industry and the Board Should Adopt Reporting Requirements for PTC Expenses and Investments as Proposed in the NPRM So That the Board Is Aware of Such Expenditures for Oversight and Other Regulatory Purposes

The rationale for adopting reporting requirements for PTC is straightforward: Class I railroads are spending and will spend substantial amounts of money to implement PTC. The AAR estimates that total PTC implementation costs for Class I railroads will be approximately

[8] In addition, in the NPRM the Board stated that previous concerns about the confidentiality of information presented in the R-1 were sufficiently mitigated against by the fact that carriers were not required to provide line-specific information in the proposed R-1 PTC schedules. However, in the event that a state entity requires that state-specific versions of any of the R-1 PTC schedules, such schedules may contain PTC investment information that is sufficiently detailed and geographically specific that the schedules would be security sensitive as well as commercially sensitive. The AAR asks the Board to recognize that, in those instances, it would be appropriate for the content of those state-specific schedules to be accorded confidential treatment.

$5.8 billion and that PTC will require hundreds of millions of dollars each year to maintain;[9] and, even pursuant to Federal Railroad Administration ("FRA") estimates, the railroad industry will spend between $9.5 billion and $13.2 billion over the next 20 years to install and maintain PTC systems.[10]

As the Board recognizes, the agency should be aware of these expenditures to properly perform its oversight role with respect to the rail industry. "This will help us to identify transportation industry changes that may require attention by the agency and to assist the Board in preparing financial and statistical summaries and abstracts to provide itself, Congress, other government agencies, the transportation industry, and the public with transportation data useful in making regulatory policy and business decisions." *Id.* at 4.

Unless PTC-related financial and operating data are reported by the railroad industry on a routine basis through the filing of prescribed annual R-1supplementary schedules with the Board, the Board may be unable to reconstruct the data in a manner that it finds satisfactory, and thus it may be unable to use the data for its own oversight purposes or for future regulatory proceedings. Moreover, large amounts of capital spending concentrated in a relatively few accounts over a few years could potentially impact URCS calculations, and capturing PTC capital investment on a periodic basis would better equip the Board to recognize and evaluate such impacts as it pursues its review of URCS.

Further, a major portion of the overall cost of PTC will be spent over the next several years as railroads develop and install PTC technologies on their lines. The Board should adopt

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[9] See Association of American Railroads, Positive Train Control (March 2011), *available at* http://www.aar.org/Safety/~/media/aar/Background-Papers/Positive-Train-Control-03-2011.ashx.
[10] *Positive Train Control Systems*, 75 Fed. Reg. 2,598, 2, 684 (Jan. 15, 2010). That estimate may somewhat decrease under FRA's proposed amendment to its regulations that would likely save the railroad industry certain expenses related to PTC implementation. *Positive Train Control Systems*, 76 Fed. Reg. 52, 918 (Aug. 24, 2011). The FRA estimates the potential costs under its proposed rule will only be $620 million to $818 million less over a twenty-year period than its $9.5 billion to $13.2 billion original estimates over that same period. *Id.* at 52919.

PTC reporting requirements expeditiously so that the information it compiles effectively captures these costs and reflects total overall PTC costs as much as possible. The fact that carriers are currently free to separately account for their own PTC costs or that they could voluntarily submit PTC data themselves in Board proceedings is no substitute for the clarity the Board could bring to the regulatory costing process through specific Board-prescribed reporting requirements.

B. AAR Recommendations Regarding the Mechanics of the Board's Proposal

1. Supplemental R-1 reporting schedules 330, 332, 335, 352B, 700, 710, and 720 should become effective as soon as adopted by the Board and should be made mandatory as a reporting requirement for the 2012 Calendar Year.

As noted supra, rail carriers are currently incurring significant capital costs in developing, acquiring and installing PTC-related equipment and systems and such expenditures will significantly increase as the rail industry approaches the 2015 PTC implementation deadline. The AAR accordingly urges that the Board's reporting requirements pertaining to PTC-related capital costs be put in place as expeditiously as possible to ensure that all such ongoing current and future investment costs are captured in the supplementary PTC Schedules proposed by the Board to the maximum extent possible.

The AAR believes that individual rail carrier accounting systems can be readily adapted to report such PTC-related capital costs pursuant to the schedules proposed by the Board by early 2012 (although some carriers may be ready earlier than others). The AAR accordingly requests the Board to handle this proceeding expeditiously and issue its decision as early in 2012 as possible. The AAR also proposes that the Board require that the PTC reporting requirements applicable to Schedules 330, 332, 335, 352B, 700, 710, and 720 be effective on date of adoption and made mandatory for reporting purposes as of the 2012 Calendar Year (i.e., the Annual R-1

Report due March 2013 for the 2012 Calendar Year) when all carriers should have their respective PTC accounting systems in place for the applicable reporting schedules. [11]

2. Supplemental R-1 reporting Schedule 410 (relating to PTC operating expenses) should become effective as soon as adopted by the Board and made mandatory as a reporting requirement for the 2014 Calendar Year.

Although the AAR believes that the proposed reporting requirements set forth in each of the Board's proposed schedules should be made effective as soon as possible, the AAR believes it is necessary to make special provision regarding the mechanics and timing of the Schedule 410 reporting requirement relating to PTC-related operating expenses. Because significant PTC-related operating expenses, unlike currently ongoing rail carrier investments in PTC-related systems and components, likely will not be incurred by the railroad industry until PTC systems are in operation on specific line segments, the railroad industry believes there is sufficient advance preparation time available to the industry that should be taken advantage of with respect to the timing of Board implementation of reporting requirements pertaining to PTC-related operating expenses.

The reporting of PTC-related operating expenses on the Board's proposed Schedule 410 is a more complex task than reporting PTC-related capital costs. PTC-related operating costs are more difficult to capture than PTC-related capital expenditures and must be appropriately allocated to the various line items (and columns) in the proposed expense schedule. [12]

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[11] It should be noted that many of the lines in the proposed schedules in Appendix B to the NPRM (including many in Schedule 410 relating to operating expenses), would be irrelevant for PTC reporting; and accordingly, those lines would be left blank. In addition, some of the line entries would likely be based on aggregations or allocations. It should also be noted that, although the proposed Schedule 710S is also included in Appendix B, the Board is only requesting carriers to "identify the number of locomotives equipped with PTC" on Schedule 710, and capital costs associated with adding PTC equipment to locomotives will be captured in Schedule 330. Accordingly, Schedule 710S is unnecessary and should be deleted from Appendix B.

[12] For example, it is relatively easy to identify the costs of adding PTC-equipment to a wayside device that houses other wayside equipment, but more difficult to decide how to treat maintenance activities that affect, for example, power supply to the whole wayside device. Moreover, in general, there are more operating expense accounts than road property accounts, so it requires more effort to allocate cost.

Accordingly, although individual rail carrier accounting systems and processes can be readily adapted to report PTC-related capital costs, carrier adaptation of their respective accounting systems and processes to capture PTC-specific operating expenses is more complex and will require more carrier preparation than recording PTC investments. The AAR submits that both reporting carriers and the Board would benefit from a phase-in of Schedule 410 to allow individual rail carriers a full opportunity to modify and test their respective current accounting systems with respect to the reporting of PTC-related operating expenses before such reporting requirement is made mandatory.

The AAR accordingly proposes that Schedule 410 become effective as soon as adopted by the Board and made mandatory as a reporting requirement for the 2014 Calendar Year (i.e., the PTC reporting schedules due June 30, 2015 for the 2014 Calendar Year).

3. The Board should allow for voluntary early reporting of PTC expenditures.

To provide the Board with detailed PTC information as expeditiously as possible, the AAR also proposes that carriers be permitted to file the above PTC reporting Schedules for PTC costs incurred in prior years on a voluntary basis as soon as they are effective (including for calendar years up to and including 2011, if applicable).

4. Reports on PTC expenditures should be due 90 days after the March 31 reporting date for the R-1.

The AAR proposes that, for *all* annual PTC reporting schedules filed by rail carriers subsequent to the effective date of a Board decision adopting the proposed PTC supplements to the annual R-1, the Board also provide an additional grace period of 90-days from the R-1 submission for the filing of the supplementary PTC reporting schedules (i.e., until June 30 of each reporting year). The preparation of the annual R-1 report by the March reporting date is itself a time-consuming process for the rail industry, and a 90-day additional grace period should be provided to allow carriers additional time that may be necessary to prepare both the annual R-1 (by the March reporting date) and the supplemental PTC-related data that the Board would require. The 90-day grace period would be optional, and a carrier would be free to voluntarily file the supplementary PTC reporting schedules at an earlier date (e.g., at the same time the R-1 is due) should its supplementary PTC reporting schedules be complete at that time.[13]

5. The Board should provide for a mandatory review of its PTC reporting requirements including those applicable to Schedule 410 one year after full implementation.

The Board should provide for a reevaluation of its PTC reporting Schedules (including Schedule 410) in light of the experience gained through practical carrier application to determine what reporting should be modified, expanded or discarded. The AAR accordingly proposes that the Board provide for a mandatory review of its PTC reporting requirements within one year after the full implementation of PTC.

C. The Board should not adopt its proposed PTC Grants Schedule

In the NPRM the Board proposes that, in addition to separating capital expenses and operating expenses incurred by the railroad for PTC, "the respondent entity should include by footnote disclosure the value of funds from government transfers, including grants, subsidies, and other contributions or reimbursements, used or designated to purchase or create PTC assets or to offset PTC costs." This additional information is requested by the Board to "help the Board to monitor the financing of PTC installation." NPRM at 5.

[13] The AAR would also note that if the Board does require the separate PTC reporting as proposed in the NPRM and the Board expeditiously issues such a requirement, the Board's decision would not be served until sometime in 2012. Accordingly, carriers may not be in a position to file Schedules by the March 2012 deadline for the 2011 Calendar Year R-1, especially in view of the lead time necessary to gather and report such data. The AAR accordingly proposes that carriers be provided a 90-day grace period from the date that the Board issues its decision requiring supplementary Schedules to file such supplementary Schedules for the 2011 Calendar Year if they are prepared to do so on a voluntary basis.

The AAR submits that the Board's proposed PTC Grants schedule is unnecessary and should not be adopted. As a practical matter, if a rail carrier obtains a grant or other government transfer to finance PTC installation,[14] the gross capital expenditure would not be recorded by the carrier as a gross cost because it did not pay the gross cost. Only the net cost would be recorded by the carrier as a capital expenditure on Schedule 330. Accordingly, for purposes of the annual R-1 reporting process as applicable to PTC-related capital expenditures, the source of government grants or transfers for specific PTC-related capital expenditures is irrelevant since only the railroads' net costs are reported as capital expenditures on the R-1. Accordingly, no supplement to the R-1 is necessary to break out government transfers from reported PTC investment costs. Moreover, requiring a supplemental schedule that details transfer payments that are already netted out of investment could be confusing.[15]

The AAR believes that there is a far better way for the Board to obtain information on government transfers for PTC implementation without jeopardizing the potential security or confidentiality of the PTC-related information disclosed. If the Board requires specific information regarding the source of government grants for the purpose of monitoring the financing of PTC installation, the AAR submits that the Board should request this information from carriers in a separate report where any sensitive security (or commercial) information pertaining to the rail transportation of TIH materials may be protected by confidentiality requirements approved by the Board on a case-by-case basis at the request of and on the supporting grounds provided by the submitting carrier.

[14] The AAR understands the Board's request pertaining to government transfers or other contributions as relating solely to PTC installation expenditures, which would all be reported as capital expenditures.

[15] For example, assume that a railroad invested $100 million and received grants or reimbursements totaling $10 million. The railroad's supplemental schedules 330, 335 and 352B would include the original net investment of $90 million ($100 million minus $10 million) but the supplemental schedule listing $10 million in credits could cause confusion about whether net investment was $90 million (correct) or $80 million (incorrect).

The AAR would also urge that, if the Board nevertheless deems that there is need for the PTC Grants Schedule in its proposed form, the Board at minimum ensure that no sensitive security (or commercial) information pertaining to the rail transportation of TIH materials is inadvertently disclosed by (1) permitting carriers to provide the "location of the project funded" information on the proposed form at the state or regional level for projects other than those noted by FRA identification and (2) providing carriers an opportunity to petition the Board on a case-by-case basis for confidential treatment of any other data that the carrier deems of sensitive security or commercial status.

Finally, if the Board deems that information on "government transfers" relating to the implementation of PTC would provide useful information to the Board in whatever form the information is solicited, the AAR believes that it would be useful for the Board to clarify what constitutes a "government" entity for reporting purposes. The AAR believes the term "government entity" for purposes of reporting "government transfers" for PTC installation (i.e., government grants and other government contributions) should specifically include only direct grants from departments or agencies of government. It should not include non-governmental entities such as Amtrak[16] or other quasi-public entities (i.e., an entity providing public services but under private ownership or control) making payments under agreement.

D. The Board should require carriers to report operating statistics pertaining to TIH movements under Schedule 755 by the mandatory target date of the 2012 Calendar Year. The operating data would assist the Board in monitoring the effects of PTC implementation.

In the NPRM, the Board requested comment on whether the Board should include schedule 755[17] in the PTC supplement and "whether collecting such information would assist the

[16] See 49 U.S.C. 24301 (a) (3).

[17] Schedule 755 requires reporting information about freight traffic, but it does not require separate reporting for TIH traffic for which PTC implementation is mandated.

Board in monitoring PTC implementation…." NPRM at 5-6. The AAR believes that reporting requirements for operating data pertaining to TIH movements under Schedule 755 would, in fact, assist the Board in monitoring the effects of PTC implementation; and, accordingly, the Board should include a PTC version of Schedule 755 in the PTC supplement. Such reporting would provide the Board operating statistics for the movement of TIH materials so that the Board can monitor the financial and service implications for railroads regarding PTC implementation from an economic and efficiency perspective.

The reporting of operating statistics would also be essential for use in other Board regulatory proceedings. Should the Board determine to pursue a rulemaking to refine URCS to better capture the operating costs of transporting hazardous materials,[18] the operating statistics provided by a PTC version of Schedule 755 would be immediately available to the Board and the parties to assist the Board in a review of URCS.

Further, the burden of collecting the operating statistics on a PTC version of Schedule 755 would fall on the Class I carriers, not the Board. Under such circumstances, there is no reason for the Board *not* to collect the operating statistics under Schedule 755 as part of its PTC reporting requirements as voluntarily proposed by the Class I carriers themselves.[19]

[18] See EP 681 cited supra at 4.
[19] Because the operating statistics on a PTC version of Schedule 755 may contain sensitive security or commercial information, the AAR would also urge that carriers be permitted to file such information with Board-approved confidentiality protections against unauthorized disclosure.

Conclusion

The Board should adopt the PTC reporting requirements as set forth in the NPRM with the modifications proposed by the AAR.

Respectfully submitted,

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